

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-CV-22671-ALTONAGA/TORRES

DELIO BATISTA,
CARLOS LOPEZ,
MARIANA LOPEZ and
RAFAELA VALIENTE,

Plaintiffs,

vs.

AVANT ASSURANCE INC.,
REINIER CORTES, AND
ANDREA GONZALEZ
QUINTERO,

Defendants.

_____ /

PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS

Plaintiffs, Delio Batista, Carlos Lopez, Mariana Lopez, and Rafaela Valiente, in compliance with the Order Providing Instructions for Jury Trial [ECF No. 79], submit the following:

1. Will anyone have a problem being fair and impartial towards the Plaintiffs, Mr. Batista, Mr. Lopez, Ms. Lopez, or Ms. Valiente, because they will be testifying through an interpreter at trial?
2. Does anyone have their own business, or has anyone had their own business at one time or another?
3. Does anyone here work as an independent contractor?
4. Has anyone asked to be paid as an independent contractor instead of an employee?
5. Has anyone been hired by an employer as an independent contractor instead of as an employee to save the company money?

6. Does anyone currently work, or has anyone worked at an insurance agency or as an insurance agent?
7. Is anyone an accountant, tax preparer, or married to an accountant or tax preparer?
8. Does anyone here get paid time and one-half for working overtime?
9. Has anyone ever asked their employer about getting paid overtime or minimum wages?
10. Does everyone believe you have a right to bring their dispute or case to court?
11. Can we all agree that everyone has a right to settle their disputes in Court?
12. Can we all agree that just because you file a lawsuit does not mean you are right, wrong, or a bad person?
13. Does anybody know about the federal overtime pay requirement?
14. Who has heard about or knows about the Fair Labor Standards Act or the FLSA?
15. Does anyone get paid time and one-half for working overtime?
16. Has anyone ever asked their employer about getting paid overtime?
17. Does anyone here feel they should be getting paid overtime pay by their employer but is not getting paid overtime?
 - a. Why do you feel that way?
18. Does anyone believe an employee must be paid hourly to be entitled to overtime pay?
19. Does everyone believe that it is important to be honest in your business dealings?

Dated this 26th day of June 2023.

s/Brian H. Pollock, Esq.
Brian H. Pollock, Esq. (174742)
brian@fairlawattorney.com
FAIRLAW FIRM
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
Tel: 305.230.4884
Counsel for Plaintiffs